

ENGINEERING DEPARTMENT

February 13, 2004

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California Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501-3339

SUBJECT: COMMENTS ON THE SAN BERNARDINO COUNTY MODEL WATER QUALITY MANAGEMENT PLAN GUIDANCE DOCUMENT

I hereby submit the following comments for the City of Ontario and recommend that the following revisions be made to the Model Water Quality Management Plan Guidance Final Draft document.

Section 1.2, page 1-2, Table 1-1 (item #4.) This statement should be revised to clearly state “Automotive Repair Shops, *Auto Body Shops, Auto Parts Stores and Gasoline Service Stations* (with SIC codes 5013, 5014, 5541, 7532-7534, 7536-7539).

Section 1.3, page 1-3, top paragraph, first line. “A-1, A-2 and” should be removed from this sentence. In order to determine if a WQMP is necessary for a project, the developer should only have to fill out page A-3!

Section 2.2.1, page 2-2, Table 2-1, last column heading. Should read “Parking Lots (>5,000 ft²)” not (5,00 ft²)

Section 2.3.1, page 2-7, Design BMPs, Landscape Planning, line 6. What are “County Administrative Design Guidelines”? I am not familiar with what these are. Our resident Landscape Architect tells me that there is no such thing for San Bernardino County and that there is only an Assembly Bill that specifies how landscape design and water conserving irrigation should be installed. I will get the assembly bill number for this requirement and will supply it when we meet next.

Section 2.3.1, page 2-7, Storm Drain Signage. The existing text under this item is acceptable but additional text should be added that states “ *The legibility of storm drain inlet markers and signs must be maintained by the property owner, POA or HOA and the responsible party should enter into a maintenance agreement with the City or County to record a deed restriction upon the property title to maintain the legibility of placards or signs.*”

Section 2.3.1, Areas and Activity Control BMPs, Fueling Areas, page 2-8. A third paragraph should be added under this section stating “*For fuel spillage outside the fuel dispensing area, a stormwater clarifier should be installed uphill or upstream of any on-site storm drain inlets or installed to treat surface flows from the property before entering a storm drain for the following reasons: 1) To prevent fuel spills from entering the storm drain system directly. 2) For treatment of residual fuels and oils in from paved areas of the site.*”

Section 2.3.1, Areas and Activity Control BMPs, Maintenance Bays and Docks, page 2-9. The first sentence of the first paragraph should read “*Maintenance Bays, loading docks and truck wells must be kept in a clean and orderly condition...*” The first sentence of the second paragraph should be revised to say “*Maintenance bays and loading dock areas should be covered and drainage from adjoining roofs and pavements diverted around them.*” The last sentence of this paragraph has a typo where it says “should drain through water quality inlets, or to an ~~d~~ engineered infiltration system....” - remove the “d” from “and” in this sentence.

Section 2.3.1, Areas and Activity Control BMPs, Trash Storage Areas and Litter Control, page 2-9. Revise the 3rd sentence of the first paragraph under this section to read, “For trash container areas associated with fuel dispensing , vehicle repair/maintenance, industry, *grocery stores and multi-family residential uses such as apartments, condominiums or mobile home parks*, grade and pave the area to eliminate or reduce run-on of storm water to the maximum extent practicable *and construct a solid roof over the enclosure. Food Service business trash enclosures should also be roofed and have a center-sloped drain installed in the enclosure floor with connection to a sanitary sewer.* The City of Ontario recommends requiring roofs over these type of trash enclosures for the following reasons: 1) Trash dumpster lids are usually flipped back and not covering the container; 2) A solid roof would prevent rain from getting into trash bin, causing leakage of contaminated storm water out of the trash container and out of trash trucks; 3) To prevent bacteria from food waste and litter that has fallen on the ground inside of the trash enclosure from washing into the storm drain system; 4) To prevent abandoned hazardous waste often found near trash enclosures from washing into the storm drain system.

Preceding the first sentence of the 2nd paragraph under this same section a sentence should be added that reads, “*All property owners are required to control trash accumulation and litter on their property through regularly scheduled sweeping, landscape maintenance and trash pickup.*” For developments with POAs, the POA must be required to

Section 2.3.1, Areas and Activity Control BMPs, Vehicle Washing Areas, page 2-9 and 2-10. In the second paragraph, first line, the word business should be pluralized to “*businesses*”. The third sentence of this same paragraph should be revised to say: “Where steam cleaning occurs, provide wash racks *connected to sewer via a sand and oil interceptor* and/or structurally contain ...” .

Section 2.3.1, Areas and Activity Control BMPs, Outdoor Material and Chemical Storage Areas, page 2-10. Revise the first sentence to read: “Where plans propose outdoor storage *of materials or* containers for oils, solvents, ...” Add the following verbage to the end of the first sentence “*and a solid roof or cover to prevent the accumulation stormwater inside the containment structure.*”

Section 2.3.1, Areas and Activity Control BMPs, Outdoor Work Areas, page 2-10. I feel that this whole paragraph under Outdoor Work Areas should be struck from this document due to the fact that all regular outdoor processing , repair , manufacturing, etc. should be done inside of a roofed building.

Section 2.3.1, Areas and Activity Control BMPs, Outdoor Processing Areas, page 2-10. The first sentence should be revised to read: “Where wet material processing occurs (e.g., electroplating), *a roof shall be installed to cover the area and* secondary containment structures shall be provided ...”

Section 2.3.1, Areas and Activity Control BMPs, page 2-10, Add a new section entitled “Outdoor Equipment and Parts Storage Areas”, with a paragraph like “ *Where equipment or parts of equipment are stored outside, a roof or cover shall be provided where the equipment contains oils, grease, chemicals, or is covered with oily deposits, sediment or other materials which could contaminate stormwater.*”

Section 2.3.1, Areas and Activity Control BMPs, Street Sweeping Private Streets and Parking Lots page 2-10. Preceding the first sentence of this paragraph under this section, a sentence should be added that reads, “*All property owners shall sweep and maintain paved areas of their property to effectively control and*

reduce the amount of sediment, landscaping waste and trash from entering a Municipal Separate Storm Sewer System (MS4). The second sentence should also be revised to read “For developments with POAs and privately owned streets and parking lots, the streets and parking lots must be swept at least *monthly during the rainy season and once during the dry season to control debris from entering a MS4* ~~annually to reduce the amount of sediment, garden waste, and trash from entering the storm drain.~~

Section 2.3.1, Areas and Activity Control BMPs, Building and Grounds Maintenance, page 2-10.

Add a new subsection under this section of the document with verbage like “The property owner or POA will prevent or reduce the discharge of pollutants to stormwater from building and grounds maintenance activities by preventing the discharge of washwater, rinsewater, following approved landscape management practices, preventing and cleaning up spills immediately, keeping trash, waste materials and debris from entering the storm drains and maintaining the stormwater collection system.”

Section 2.3.2 Site Design BMPs, page 2-11. I am concerned about the way that the first sentence under this section is stated. It says “Projects for which hydrologic conditions of concern have been identified shall control post-development peak stormwater runoff discharge rates and velocities to protect stream habitat and to prevent downstream erosion and sedimentation.” What about if there are no hydrologic concerns for a project? Let’s say there is plenty of capacity in the downstream concrete channel storm drain. Do we just waive this requirement? I think that this statement will allow many developers to challenge us on the requirement to install stormwater infiltration swales, etc. as part of the development plan. Perhaps we should restate this sentence to require that pervious areas of the site be used to the maximum extent practicable for infiltration of runoff from building and pavement areas.

Section 2.3.3 Treatment Control BMPs, Retention/Irrigation, page 2-16. Need period at end of this paragraph.

Attachment A, WQMP Template, page A-4. Item #1 on this page “All significant re-development projects.” The term “SUSMPs” in the 7th line of this paragraph should be replaced by “a WQMP”

Attachment A, WQMP Template, Section 3, Best Management Practice Selection Process, page A-6. The priority project category at the bottom row of the table for Source Control BMPs needs to be revised to read: “Parking Lots >5,000 ft² ~~2,500~~ of exposed storm water” .

Attachment A, WQMP Template, Treatment Control BMP Selection Matrix, page A-8. The priority project category at the bottom row of the table for Treatment Control BMPs needs to be revised to read: “Parking Lots >5,000 ft² ~~2,500~~ of exposed storm water”.

If you have any questions in regards to these recommendations, please call me at (909) 395-2389.

Sincerely,

Steve Wilson
Environmental Water/Waste Water Engineer

SW:cp
Enclosures

c: Matt Yeager, San Bernardino County Storm Water Program